

## EXHIBIT A

Emergency:  
911

Non-Emergency:  
(412) 431-2254

Frank Mosesso  
Chief of Police



**BOROUGH OF MOUNT OLIVER**  
**POLICE DEPARTMENT**

150 BROWNSVILLE ROAD, MT. OLIVER, PA 15210-2165

Police Department Fax:  
(412) 431-5267

Email Address:  
mtoliverpolice@comcast.net

Chief of Police  
412-431-3899

TO: MAYOR CASSIDY

FROM: CORPORAL MURRAY

SUBJECT: HOSTILE WORK ENVIRONMENT

DATE: APRIL 7, 2013

This is a follow-up to our discussion on this date in regards to continuous hostile work environment. I do not think that it is appropriate that I was informed that one of the new-hires (Officer Lucas) was starting his career as Mt. Oliver Police Officer from a local business owner. As you are well aware Mayor Cassidy I have tried to address the hostile work environment that Senior Sergeant Matt Juzwick continues to ensue. I have maintained a professional attitude in hopes that the situation would correct itself but after this latest issue, I do not believe that the issue will be resolved. I have come to work knowing that valuable information was not passed onto me and I dealt with that the best I could. Not only was I not aware that Officer Lucas was scheduled to begin work at 15:00 hours on this date, I was unaware that he is also scheduled for the 3-11 shift on April 8, 2013.

I am becoming well aware that apparently it is funny to keep information from not only a SHIFT SUPERVISOR but a CORPORAL. I do not believe that I should find out information from a patrolman who heard it from a business owner that Officer Lucas was starting at 15:00 hours on this date. I know Mayor Cassidy it was a mistake on the schedule but as per the update schedule the new hires were not scheduled to begin until April 14, 2013. As a supervisor this causes liability and officer safety issued within the chain of command. You are well aware per the Police Department Operating Guidelines that while Senior Sergeant Matt Juzwick, who was placed in charge of the department per Council, is not there I am acting in his place. I take my position extremely serious and being excluded from important information is unacceptable, this is a place of professionalism not a high school atmosphere. Until Chief Mosesso is released from Worker Comp or a new Chief is appointed, I hold Senior Sergeant Matt Juzwick accountable for the lack of leadership, poor communication and the hostile work environment that is becoming a daily occurrence and is not being addressed by neither you, the Mayor or Senior Sergeant Juzwick even though I have made every attempt to solve the situation. Since there is no human resource personnel available I want a mediator brought in to resolve specific departmental issues and due to having current EEOC and retaliation complaints pending I am aware that Council cannot be involved.

I have had firsthand observations of how Sergeant Juzwick treated two other supervisors, one being a female in this manner causing turmoil within the department and ultimately forcing the supervisors to resign because of the hostile work environment. I will not allow Sergeant Juzwick to force me out of this police department due to this unprofessional behavior. Your urgent attention to this matter would be greatly appreciated.

 4-7-13  
Cpl. Laura Murray

## EXHIBIT B

Emergency:  
911  
Non-Emergency:  
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Frank Mosesso  
Chief of Police



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**BOROUGH OF MOUNT OLIVER**  
**POLICE DEPARTMENT**

150 BROWNSVILLE ROAD, MT. OLIVER, PA 15210-2165

TO: MAYOR CASSIDY  
FROM: CORPORAL MURRAY  
SUBJECT: HOSTILE WORK ENVIRONMENT  
DATE: APRIL 8, 2013

This memo is to inform you, Mayor Cassidy of another hostile work environment situation that occurred on Monday, April 8, 2013. As you may have made aware our computer system had crashed sometime on Saturday afternoon and Officers were unable to access them in order to preform our daily complaints and incident system known as Crime Star. Officers were unable to log onto the computers and at this time it was determined that Independent Micro would need to be contacted and a service tech would need to respond to the station and address the problem.

On this date, at approx. 07:50 hours I contacted Independent Micro and left a message like I have done for the past seven years. I left a brief message of the problem and provided my cell phone number so that I could be reached. At approximately 8:50 hours Vince from Independent Micro returned my call and I explained to him the situation. I was not at the station at this time and he asked that once I return to the station I call him on his cell phone so that he could walk me through some of the trouble shooting issues to see if that corrected the problem. Once back at the station it was determined that I was not able to fix the problem and he would make a service visit. I had asked Diane Holzer to notify me when he arrived. At approximately 10:00 hours Vince arrived and was able to fix the problem. He showed what cable came loose if this problem were to arise again.

Officer Toney had returned from Criminal Court and after completing a 911 dispatch call, Officer Toney had made a comment that he needed to contact Vince in order to find out what the problem was. Once back at the station Officer Toney had contacted Independent Micro and spoke to Vince and had also asked Vince for his personal cell phone number so that Officers could reach him. Officer Toney never asked me to explain to him what the problem was and if I was willing to show him what Vince had not shown me nor did he ask me if I had a contact number for Vince. I had explained to Officer Toney that I would have been more than willing to show him what Vince showed me and with that Officer

Toney got a very scared look in his eyes and said, "Sergeant Juzwick wanted me to call and get the information." I do not understand why a patrolman would be ordered to call and get this information when I am a supervisor and on my-shift I handled the problem. Officer Toney also asked me no to put him in the middle and he has many bosses (meaning he is low in seniority).

I have been employed as a police officer with the Mt. Oliver Borough for seven years and I am more than capable of making arrangements so that our equipment can be serviced and make myself available so that Officer Toney can be available to handle calls he is dispatched to. Unless the situation changed I am only aware of two supervisors having keys to the Chief of Police office and that would be Sergeant Juzwick and myself, so how would Officer Toney gain entry into the this office so that Vince could access the main server?

Again Mayor Cassidy I am advising you that I am being forced out of the daily operations of running this police department. I am a supervisor and if a problem were to arise I handle it the best way I know how and if there is a problem I cannot handle I will contact Sergeant Juzwick for advice. I do not understand why a patrolman is ordered to call and get information for another supervisor when I was present this is an example of the lack of communication within the chain of command and shows the unprofessionalism that continues within this department . Due to ultimately being in charge of this Police department and you continue to allow Sergeant Juzwick to create a hostile work environment that is not only effecting me but it is starting to effect all the officers and needs to stop. Not one officer in this department should ever ask a supervisor to not put him in the middle, there is a chain of command that needs to be followed and this should be a team effort with everyone doing their best to make this department run effectively while respecting the chain of command.

I am following my chain of command and advised you of the hostile work environment in February 2013 and nothing as of this date has been addressed.

*Cpt Laura Murray 4-9-13*

## EXHIBIT C

Police and Fire Depts.  
Emergency - 911  
Non-Emergency - 412-431-2254  
Fax: 412-431-5267



Administrative Office  
412-431-8107  
Fax: 412-431-0184  
Email: MountOliverBoro@Aol.Com

## BOROUGH OF MOUNT OLIVER

(INCORPORATED NOVEMBER 9, 1892)  
County of Allegheny — State of Pennsylvania

MUNICIPAL BUILDING — 150 BROWNSVILLE ROAD  
MT. OLIVER, PENNSYLVANIA 15210

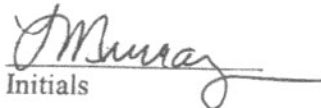
*Council Meets Third Monday of Each Month*

April 11, 2013

TO: Corporal Laura Murray  
FROM: Kathy L. Connolly, Borough Secretary  
RE: Requested Presence at the Council Meeting – Monday, April 15, 2013

The Mayor and Council are requesting your appearance at the Monday, April 15<sup>th</sup> meeting. Your meeting time is scheduled for 6:00pm. Failure to appear may result in disciplinary action.

Please acknowledge your acceptance of this meeting by initialing this letter.

  
Initials



## EXHIBIT D

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Frank Mosesso  
Chief of Police



**BOROUGH OF MOUNT OLIVER  
POLICE DEPARTMENT**

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Chief of Police  
412-431-3899

**TO: MAYOR CASSIDY**

**FROM: CPL. MURRAY**

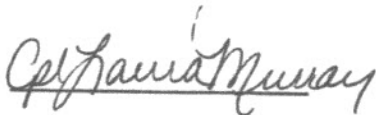
**DATE: APRIL 11, 2013**

**SUBJECT: HOSTILE WORK ENVIRONMENT**

On Thursday April 11, 2013 I noticed that Officer McCarthy was scheduled to work the 3-11 shift. I waited until 15:00 hours for Sgt. Juzwick to request me back to the station so that Officer McCarthy could ride along with me until the end of my shift at 19:00 hours and I would be his training officer. At approx. 15:10 hrs. I noticed Sgt. Juzwick's marked unit drive past me while I was seated in the loop of Transverse Park and as the vehicle passed I noticed that he had a passenger with him. I then began to proceed to the station only to notice that Office McCarthy was riding in Sgt. Juzwick's vehicle. Let me ask you this Mayor why am I scheduled to WORK a 12 hour shift when I am clearly not needed? For the past week the patrolmen have been training these new hires. I have 7 years of experience and can teach these new hires just as well if not better than Officer Brown, Officer Alex, Officer Griser and Office Toney. Is the fact the new hires are not riding with me is because I am a female and because this department now only consists of white male I am not a valuable asset to this department. You, Mayor are allowing this department to become an all white male department without minorities and is that because you and Council do not want to accommodate minorities? I have trained officers in the past and never had an issue. Another question Mayor, Sgt. Juzwick only called himself and me into service for the pm shift what is Officer MCCarthy's call sign if he has one? Would this not be a safety issue if a priority call was dispatched and Officer McCarthy was left on his own and did not have a call sign and the 911 dispatch center did not have him in service?

This is the second time in a seven day schedule that I was completely left out of any decision regarding the operation of the police department. If I am not needed then do not schedule me to work a 12 hours shift.

As the Mayor of the Police Department and the fact that this is my third memo to you this week alone am I going to get a response from you concerning any of these issues? This is my cell phone number (412) 715-4498 feel free to call me anytime.

A handwritten signature in cursive script, reading "Cpl. Laura Murray". The signature is written in dark ink and is positioned above the printed name.

CPL. LAURA MURRAY

## EXHIBIT E

Emergency:  
911

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Frank Mosesso  
Chief of Police



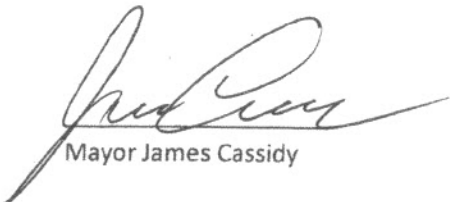
**BOROUGH OF MOUNT OLIVER**  
**POLICE DEPARTMENT**

150 BROWNSVILLE ROAD, MT. OLIVER, PA 15210-2165

Police Department Fax:  
(412) 431-5267  
Email Address:  
mtoliverpolice@comcast.net  
Chief of Police  
412-431-3899

Cpl. Murray,

This letter is to advise you that the schedule has been changed due to you claiming a hostile work environment and Sgt. Juzwick claiming that he is being harassed by all the actions that you are taking. Under section 1100.8 of the guide lines **SCHEDULING AND MANAGEMENT RIGHTS** and **ARTICLE NO. 5 SECTION E**. I feel this is the best course of action at this point. If you have any questions feel free to contact me.

  
Mayor James Cassidy

4-13-13  
date

# MT OLIVER POLICE DEPARTMENT SCHEDULE

OFFICIAL AND CONFIDENTIAL DOCUMENT. INTER-DEPARTMENTAL ONLY S.O.G. 300.16

APRIL 7 2013 TO MAY 4 2013

DATE	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	1	2	3	4
DAY	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
Sgt Juzwick 116				G	G	G	G			A	A	G	A	A														
Cpl Murray 110	G	G	A	A	G			G	G	A	A	A			G	G	A	A	G			G	G	A	A	G		
Cpl Lockhart 104	H			H	H	H	H				C	H	C	C	H				C	H	C	H				C	H	C
Ofc Alex 102		B	B	T	T	G				B	B	B	G	G														
Ofc Brown 108	H	C	H	C	H			H	H	C	C	C			H	H	C	C	C			H	H	C	C	C		
Ofc Larkins 114																												
Ofc Griser 109		H	C	B		H	H			H	C	B								H	H							
Ofc Toney 115	G	A		T	T		G	G	G	B			B	B	G	G	B			B	B	G	G	B			B	B
Ofc Lucas 107	B	B					A	B	B					B	B	B						B	B	B				B
Ofc McCarthy 103		B		B	A					B		B	A							B	A				B		B	A
Ofc Candiano 111	C	C			B		C	C					B		C	C												B
Ofc																												
Ofc																												

P = PERSONAL

R = REQUESTED OFF

T = TRAINING

S = SICK

OFFICER IN CHARGE

H = HOLIDAY

D = DETAIL

COMMUNITY DAYS

X = SUSPENSION

A = 0:700 TO 15:00

B = 15:00 TO 23:00

C = 23:00 TO 07:00

D = 08:00 TO 16:00

E = 16:00 TO 12:00

F = 12:00 TO 08:00

G = 07:00 TO 19:00

H = 19:00 TO 07:00

1 = 04:00 TO 12:00

2 = 12:00 TO 20:00

3 = 20:00 TO 04:00

4 = 13:00 TO 21:00

B = BIKE PATROL UNIT

B2 = BPU

B3 = BPU

B4 = BPU

# MT OLIVER POLICE DEPARTMENT SCHEDULE

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APRIL 7 2013 TO MAY 4 2013

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DAY	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
Sgt Juzwick 116			G	G	G	G	G			A	A	A	A	A				A	A	A	A							
Cpl Murray 110	G	G	A	A	G			G	G	C	C	C	C		G	G	C	C	C			G	G	C	C	C		
Cpl Lockhart 104	H			H	H	H	H	H		A	A		C	C	H		A	A		C	C	H		A	A		C	C
Ofc Alex 102		B	B	T	T	G				B	B	B	G	G			B	B	B	G	G			B	B	B	G	G
Ofc Brown 108	H	C	H	C	H			H	H	C	C	H			H	H	C	C	H			H	H	C	C	C		
Ofc Larkins 114																												
Ofc Griser 109		H	C	B		H	H		H		B	G	H	H				B	G	H	H		H		B	A	H	H
Ofc Toney 115	G	A		T	T		G	G	G	B			B	B	G	G	B			B	B	G	G	B			B	B
Ofc Lucas 107	B	B					A	B	B					B	C	C					B	B	B				B	
Ofc McCarthy 103		B			B	A			B			B	A				B		B	A				B		B	A	
Ofc Candiato 111	C	C				B	C	C				B			B	B											B	
Ofc																												
Ofc																												

**P = PERSONAL**  
**R = REQUESTED OFF**  
**T = TRAINING**  
**S = SICK**  
**H = HOLIDAY**  
**COMMUNITY DAYS**  
**X = SUSPENSION**

**A = 0:00 TO 15:00**  
**B = 15:00 TO 23:00**  
**C = 23:00 TO 07:00**

**D = 08:00 TO 16:00**  
**E = 16:00 TO 12:00**  
**F = 12:00 TO 08:00**  
**G = 07:00 TO 19:00**  
**H = 19:00 TO 07:00**

**1 = 04:00 TO 12:00**  
**2 = 12:00 TO 20:00**  
**3 = 20:00 TO 04:00**  
**4 = 13:00 TO 21:00**

**B = BIKE PATROL UNIT**  
**B2 = BPU**  
**B3 = BPU**  
**B4 = BPU**

## EXHIBIT F



Police and Fire Depts.  
Emergency - 911  
Non-Emergency - 412-431-2254  
Fax: 412-431-5267



Administrative Office  
412-431-8167  
Fax: 412-431-0184  
Email: MtOliverBoro@comcast.net

## BOROUGH OF MOUNT OLIVER

(INCORPORATED NOVEMBER 2, 1882)  
County of Allegheny — State of Pennsylvania

MUNICIPAL BUILDING — 150 BROWNSVILLE ROAD  
MT. OLIVER, PENNSYLVANIA 15210  
Council Meets Third Monday of Each Month

April 17, 2013

Laura M. Murray

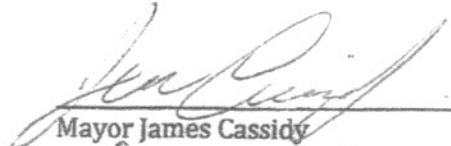
Via: Hand Delivery

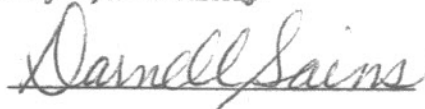
Dear Ms. Murray:

This letter will serve as formal notice that effective immediately, you have been terminated and you are no longer a member of the Mt. Oliver Police Department. You have engaged in conduct constituting gross insubordination, disobedience of direct orders from your superiors, and neglect of your official duties to protect the citizenry and your fellow officers.

You do not possess any civil service protection. Accordingly, please turn in your keys immediately. Any other issued equipment that is property of Mt. Oliver Borough must be returned as soon as possible.

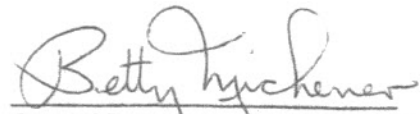
Sincerely,

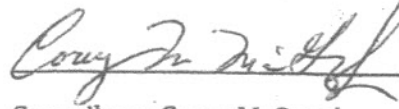
  
Mayor James Cassidy

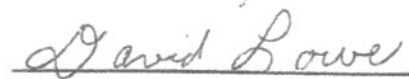
  
Councilman, Darnell Sains  
Public Safety

\_\_\_\_\_  
Councilwoman Christine Brendel

\_\_\_\_\_  
Acting Police Chief Matthew Juzwick

  
Council President, Betty Michener

  
Councilman Corey McGough

  
Councilman David Lowe